

Exhibit 2

to February 6, 2025 Letter to the Honorable Julien X. Neals, U.S.D.J.
Jennifer Michaels, M.D. v. Rutgers, the State University of New Jersey, et al.
Civil Action No.: 2:15-cv-07603-JXN-CLW

From: Neil Cartusciello ncartusciello@ccklawllc.com
Subject: Re: Michaels v. Rutgers
Date: January 31, 2025 at 8:23 PM
To: Aversa, Robyn L. (Berkeley Heights) Robyn.Aversa@jacksonlewis.com
Cc: Bennett, John K. (Berkeley Heights) John.Bennett@jacksonlewis.com, Posluszny, Linda J. (Berkeley Heights) Linda.Posluszny@jacksonlewis.com, Cesario, Millie (Berkeley Heights) Millie.Cesario@jacksonlewis.com

Hi, Robyn,

Sorry for the delay in getting back to you.

Attached are Plaintiff's proposed Sections 5 and 6.

I am also attaching a file that shows a comparison between Rutgers' version of Section 5 and Plaintiff's proposed version.

Please let me know if you need me to clarify anything or have any other questions.

Please also let me know when you think you would be available to discuss these.

Thank you.

- Neil

On Jan 22, 2025, at 1:33 PM, Aversa, Robyn L. (Berkeley Heights) <Robyn.Aversa@jacksonlewis.com> wrote:

Hi Neil, yes, we are available. Defendants' position is set forth in Exhibit 5. Please let us know what changes you propose that Rutgers may agree with. We can then set up a date and time to discuss.

Robyn

Robyn L. Aversa

Attorney at Law

Jackson Lewis P.C.

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Robyn.Aversa@jacksonlewis.com | www.jacksonlewis.com

From: Neil Cartusciello <ncartusciello@ccklawllc.com>

Sent: Tuesday, January 21, 2025 8:09 PM

To: Bennett, John K. (Berkeley Heights) <John.Bennett@jacksonlewis.com>; Aversa, Robyn L. (Berkeley Heights) <Robyn.Aversa@jacksonlewis.com>

Cc: Posluszny, Linda J. (Berkeley Heights) <Linda.Posluszny@jacksonlewis.com>

Subject: Michaels v. Rutgers

Dear John and Robyn,

Please let me know whether you are available for a meet and confer consistent with Judge Neals' December 26, 2024 Order and Opinion. If so, please also let me know some dates and times that would be convenient for you.

Thank you.

Sincerely,

Neil Cartusciello

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**2025 01 31 - Plaintiffs
Proposed Section 5...**
102 KB



**Comparison of
Rutgers and Plaintiff...**



**2025 01 31 - Plaintiffs
Proposed Section 6...**

